

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

THIS DOCUMENT RELATES TO:

ALL ACTIONS

DECLARATION OF ORRAN L. BROWN, SR.

I, ORRAN L. BROWN, SR., hereby declare and state as follows:

1. My name is Orran L. Brown, Sr. I am the Chairman and a founding partner of BrownGreer PLC, located at 250 Rocketts Way, Richmond, Virginia 23231. BrownGreer PLC is the Claims Administrator under the Class Action Settlement Agreement in this action.

2. I am over the age of 21. The matters set forth in this Declaration are based upon my personal knowledge and information.

3. I submit this Declaration to describe three Opt Out revocation requests that we received recently.

4. In its April 22, 2015 Final Approval Order and Judgment, the Court directed the Claims Administrator to post a list of Opt Outs as of that date. Accordingly, we posted on the official Settlement website a list of the Opt Outs that were timely and included all the elements required for a valid Opt Out under Section 14.2(a) of the Settlement Agreement (175 names at the time) and a list of the Opt Outs that were untimely and/or were missing one or more of Section 14.2(a)'s required elements (33 names at the time).

5. Section 14.2(c) of the Settlement Agreement provides that a Class Member who had Opted Out but wished to revoke that Opt Out could submit a written request to do so "[p]rior to the Final Approval Date." After the April 22, 2015 Final Approval Date, 15 persons who had Opted Out submitted requests to revoke their Opt Outs. The Parties to the

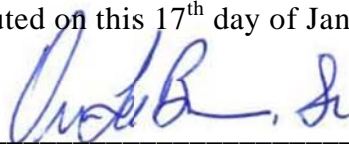
Settlement Agreement agreed to accept those revocation requests, subject to Court approval, and reported them to the Court. The Court has approved 14 of the 15 requests by Orders of July 15, 2015 (Document 6642), December 22, 2015 (Document 6713), January 26, 2016 (Document 6739), September 15, 2016 (Document 6907), October 25, 2016 (Document 6924), November 8, 2016 (Document 6937), and December 21, 2016 (Document 7033). The request by Charles Anthony Mincy, which the Parties reported on January 12, 2017 (Document 7074), is pending before the Court. Each time the Court approved a revocation, we no longer counted that person as an Opt Out and posted on the Settlement website a revised list of Timely Opt Out Requests Containing All Information Required by Section 14.2(a) or Otherwise Approved by the Court (the "Timely Opt Out List"). The Timely Opt Out List now contains 166 names.

6. On January 13, 2017, we received new revocation requests from three persons on the Timely Opt Out List:

- (a) Lex Hilliard: Attachment 1 to this Declaration is a copy of Mr. Hilliard's request, with his personal identifying information redacted.
- (b) Brian Christopher Schaefering: Attachment 2 to this Declaration is a copy of Mr. Schaefering's letter, after removing his personal information.
- (c) Ralph Williams: Attachment 3 to this Declaration is a copy of Mr. Williams' request, also with his personal information redacted.

The Parties to the Settlement Agreement have agreed to accept these three revocation requests, subject to Court approval. If the Court grants its approval, we no longer will count Mr. Hilliard, Mr. Schaefering, or Mr. Williams as Opt Outs and, upon direction of the Court, will post on the Settlement website a revised Timely Opt Out List.

I, Orran L. Brown, Sr., declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on this 17th day of January, 2017.



Orran L. Brown, Sr.

Christopher Seeger
Co-Lead Class Counsel
SEEGER WEISS, LLP
77 Water Street
New York, NY 10005

Brad Karp
Counsel for the NFL Parties
Paul, Weiss, Rifkind, Wharton & Garrison, LLP
1285 Avenue of the Americas
New York, NY 10019

Sol Weiss
Co-Lead Class Counsel
ANAPOL SCHWARTZ
1710 Spruce Street
Philadelphia, PA 19103

Re: REVOCATION OF OPT OUT FROM SETTLEMENT CLASS

Dear Counsel:

Please take notice that I, Lex Hilliard, wish to revoke my request to be excluded from the Settlement Class in *In re: National Football League Players' Concussion Injury Litigation*, No. 2:12-md-02323.

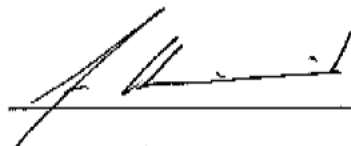
Name: Lex Hilliard

Address:

Phone No.:

Date of Birth:

Signature:



Print Name: Lex Hilliard

Date: January 11, 2017

ATTACHMENT 1

Christopher Seeger
Co-Lead Class Counsel
SEEGER WEISS, LLP
77 Water Street
New York, NY 10005

Brad Karp
Counsel for the NFL Parties
Paul, Weiss, Rifkind, Wharton & Garrison, LLP
1285 Avenue of the Americas
New York, NY 10019

Sol Weiss
Co-Lead Class Counsel
ANAPOL SCHWARTZ
1710 Spruce Street
Philadelphia, PA 19103

Re: REVOCATION OF OPT OUT FROM SETTLEMENT CLASS

Dear Counsel:

Please take notice that I, Brian Christopher Schaefering, wish to revoke my request to be excluded from the Settlement Class in *In re: National Football League Players' Concussion Injury Litigation, No. 2:12-md-02323*.

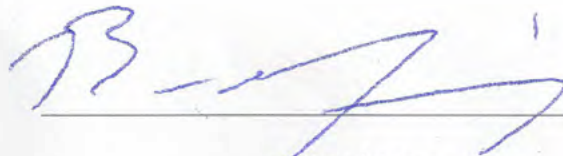
Name: Brian Christopher Schaefering

Address:

Phone No.:

Date of Birth:

Signature:



Print Name: Brian Christopher Schaefering

Date: December 27, 2016

ATTACHMENT 2

RALPH WILLIAMS

December 22, 2016

VIA FACSIMILE: 212-757-3990

Paul, Weiss, Rifkind, Wharton & Garrison, LLP
Attn: Brad S. Karp
1285 Avenue of the Americas
New York, NY 10019-6064

VIA FACSIMILE: 212-584-0799

Seeger Weiss LLP
Attn: Christopher A. Seeger
77 Water Street
New York, NY 10005

VIA FACSIMILE: 212-521-7299

Orran L. Brown, Sr.
Claims Administrator
Brown Greer PLC
250 Rockets Way
Richmond, VA 23231

Re: *In re National Football League Players' Concussion Injury Litigation;*
Case No. 12md2323; MDL No. 2323;
Revocation of Opt-Out of Plaintiff Ralph Williams

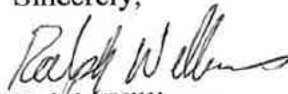
Dear Sirs:

Pursuant to Section 14.2(e) of the Class Action Settlement Agreement (as amended), in the above-referenced litigation, I, RALPH WILLIAMS, hereby state that I wish to revoke my Opt-Out request to be excluded from the Settlement Class.

It is my wish that I be restored as a member of the Settlement Class.

Thank you.

Sincerely,


Ralph Williams

ATTACHMENT 3